## KRASKIN, LESSE& COSSON, LLP

OHGNO

## ATTORNEYS AT LAW TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

2120 L Street, N.W., Suite *5*20 Washington, D.C. 20037

Telephone (202) 296-8890 Telecopier (202) 296-8893

\*02 NUG 29 AM 9 58

August 27, 2002

TN REGULATORY AUTHORITY
BOCKET ROOM

Mr. Joe Werner Chief, Telecommunications Division Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

Re:

TRA Docket No. 02-00879 Section 254(e) Certification of

Citizens Telecommunications Company of the Volunteer State to Receive USF Disbursements

in Calendar Year 2003

Dear Mr. Werner:

Attached hereto is the Certification Letter of Gregg C. Sayre, certifying that Citizens Telecommunications Company of the Volunteer State (the "Company") is in compliance with the requirements of Section 254 (e) and the requirements established by the Commission in *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket Nos. 96-45 and 00-256, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45 and Report and Order in CC Docket No. 00-256 (FCC 01-157) (released May 23, 2001) ("Order") and codified at 47 C.F.R. § 54.314.

In addition to this original, I am submitting thirteen copies of this letter, pursuant to TRA Rule 1220-1-1-.03, in addition to a date "stamp and return" copy (and accompanying postage prepaid, self-addressed envelope) that I ask you to please use for this purpose. All correspondence and inquiries concerning this filing should be addressed to the undersigned.

Sincerely,

John B. Adams

Clifford C. Rohde

Counsel to Citizens Telecommunications Company of the Volunteer State

Volunteer S

Encl.



August 23, 2002

Mr. Joe Werner Chief, Telecommunications Division Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

Re:

TRA Docket No. 02-00879 Section 254(e) Certification of

Citizens Telecommunications Company of

the Volunteer State to Receive USF

Disbursements

in Calendar Year 2003

Dear Mr. Werner:

I, Gregg C. Sayre, Assistant Secretary, of Citizens Telecommunications Company of the Volunteer State (the "Company"), do hereby certify under penalty of perjury that the following is true and accurate to the best of my knowledge and belief:

- 1. I am the Assistant Secretary of the Company;
- 2. The Company is a "rural telephone company" as defined in 47 U.S.C. §153(37), subject to the jurisdiction of the Tennessee Regulatory Authority;
- 3. The Company is eligible for disbursements from the federal Universal Service Fund ("USF") as prescribed by the Federal Communications Commission ("FCC"); and
- 4. The Company will utilize its USF disbursements for high cost support (including any high cost loop support, local switching support, high cost support received pursuant to the purchase of exchanges, high cost model support, and hold harmless support) received in 2003 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Communications Act of 1934, as amended.

Sincerely yours

Gregg & Sayre

**Assistant Secretary**